

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
McALLEN DIVISION

MATTHEW TWIST

AND ROBERT TWIST,

Plaintiffs

vs.

CATHERINE NORQUEST,

MARIO SALINAS, DAVID TORRES,

JAIMES CHAVANA, GREGORY GARCIA,

CARMEN GONZALEZ, CIRO TREVINO,

RAFAEL GARZA, ALFREDO LARA,

FERNANDO TANGUMA,

RAUL SALAZAR,

OMAR PALACIOS, MELBA GONZALEZ

RUBEN GONZALEZ, AND SEVERAL

UNKNOWN JOHN DOE EMPLOYEES

OF THE EDINBURG CONSOLIDATED

INDEPENDENT SCHOOL DISTRICT

AND OF THE HIDALGO COUNTY

SHERIFF'S OFFICE AND HIDALGO

COUNTY SHERIFF, HENRY ESCALON

AND HIS SUCESSOR

GUADALUPE TREVINO, AND

J.L. SALINAS

Defendants

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

CIVIL ACTION NO. M-06-313

**PLAINTIFF'S INITIAL DISCLOSURES**

TO : Catherine Norquest-Vasquez, Defendant, through her attorneys of record:

Hon. Robert L. Galligan  
Jones, Galligan, Key, & Lozano, L.L.P.  
P.O. Drawer 8041  
Weslaco, TX 78599-9402  
Telephone: (956) 968-5402  
Telefax: (956) 969-9402

Hon. Roger W. Hughes  
Adams & Graham  
222 E. Van Buren, West Tower  
P.O. Drawer 1429  
Harlingen, TX 78551  
Telephone: (956) 428-7495  
Telefax: (956) 428-2954

TO: School District Employees, Defendants, by and through their attorney of record:

Hon. Ricardo R. Reyna  
Brock Person Guerra Reyna  
1506 Bexar Crossing  
San Antonio, TX 78232-1587  
Telephone: (210) 979-0100  
Telefax: (210) 979-7810

TO: Sheriffs and sheriff deputy Defendants, by and through their attorney of record:

Hon. Preston Henrichson  
Hon. Marissa Carranza Hernandez  
Law Office of Preston Henrichson, P.C.  
222 West Cano  
Edinburg, TX 78539  
Telephone: (956) 383-3535  
Telefax: (956) 383-3585

Plaintiffs Robert Twist and Matthew Twist, makes these initial disclosures as required by Federal Rule of Civil Procedure 26 (a) (1).

**A. Individual with Discoverable Information**

1. The names, addresses(work and home), and telephone numbers(work and home) of individuals likely to have discoverable information that Plaintiff may use to support their claims or defenses, identifying the subjects of the information, are:

Robert Twist, Plaintiff  
Mathew Twist, Plaintiff  
c/o Stephen T. Leas, Esquire  
Law Offices Of Stephen T. Leas, PLLC  
5301 N. McColl Rd.  
McAllen, Texas 78504  
(956) 618-5327

Stephen T. Leas, Esquire  
Law Offices Of Stephen T. Leas, PLLC  
5301 N. McColl Rd.  
McAllen, Texas 78504  
(956) 618-5327  
Will testify as to reasonable and necessary attorney fees

Catherine Norquest-Vasquez, Defendant  
c/o Robert L. Galligan, Esquire  
Jones, Galligan, Key & Lozano, L.L.P.  
Town Center Tower, Suite 300  
2300 West Pike Boulevard  
Post Office Drawer 1247  
Weslaco, Texas 78596  
(956) 968-5402

Hon. Jack Lamar Wolfe  
4106 N. 23<sup>rd</sup> St.  
McAllen, TX 78504  
(956) 686-1737

Attorney for Catherine Norquest-Vasquez, advised Sheriff's Office that Plaintiff did not wish to pursue criminal complaint against Norquest

Hon Robert L. Galligan  
Jones, Galligan, Key & Lozano LLP  
Town Center Tower, Suite 300  
2300 West Pike Boulevard  
Post Office Drawer 1247  
Weslaco, Texas 78596  
(956) 968-5402

Investigated complaints against Defendant J.L. Salinas on behalf of Edinburg Independent School District

Edinburg Consolidated Indep. School District, Defendant, including the following individuals/employees:

David Jones, Defendant  
Jaime Chavana, Defendant  
Gregory Garcia, Defendant  
Carmen Gonzalez, Defendant  
Ciro Trevino, Defendant  
Omar Palacios, Defendant  
Melba Gonzalez, Defendant  
Ruben Gonzalez, Defendant  
Mario Salinas, Defendant  
J.L. Salinas, Defendant

c/o Ricardo R. Reyna, Esquire  
Greg R. Hokenson, Esquire  
BROCK PERSON GUERRA REYNA, P.C.  
1506 Bexar Crossing  
San Antonio, Texas 78232-1587  
(210) 979-0100

Hidalgo County Sheriff's Department, Defendant, including the following individuals/employees:

Fernando Tanguma, Defendant  
Raul Salazar, Defendant  
Rafael Garza, Defendant  
Alfredo Lara, Defendant  
Henry Escalon, Hidalgo County Sheriff, Defendant  
Guadalupe Trevino, Hidalgo County Sheriff, Defendant

c/o Preston Henrichson, Esquire  
Marissa Carranza Hernandez, Esquire  
LAW OFFICES OF PRESTON HENRICHSON, P.C.  
222 West Cano  
Edinburg, Texas 78539  
(956) 383-3535

Steven Michael Hopkins, Friend of Mathew Twist  
924 E. Rogers Road  
Edinburg, Texas  
(956) 381-1490- H  
(956) 533-0107-M

### **B. Relevant Documents & Tangible Things**

2. All copies of, or description by category and location of, all documents, data compilation, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

The statement of Catherine Norquest-Vasquez has been attached to the Plaintiff's pleadings.

**C. Information Related to Calculation of Damages**

3. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

- a. all economic damages, past and future, to be supplemented
- b. compensatory damages, past and future, to be determined by the trier of fact, but in an amount of no less than \$10,000,000.00
- b. Punitive damages, to be determined by the trier of fact
- c. attorney fees, based upon reasonable and necessary fee's at the rate of \$250.00 per hour
- d. Pre-judgment interest at the maximum rate allowed by law;
- e. Post-judgment interest at the maximum rate allowed by law; and
- f. Court costs and for such other and further relief to which Plaintiff may be justly entitled.

4. All insurance agreements required to be disclosed are described below:

None.

Respectfully submitted,

LAW OFFICE OF STEPHEN T. LEAS, PLLC  
5301 North McColl Road  
P.O. Box 2257  
McAllen, Texas 78502-2257  
Telephone (956) 618-5327  
Telecopy (956) 972-0313

By: /s/ Stephen T. Leas  
STEPHEN T. LEAS  
State Bar No. 12095255

ATTORNEY FOR PLAINTIFF,  
ROBERT HOLEMAN TWIST &  
MATTHEW TWIST

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the above and foregoing document has been forwarded to all attorneys of record and interested parties, on February 12, 2007.

**/S/ Stephen T. Leas**

STEPHEN T. LEAS

**Attorney for sheriff deputy Defendants**

Hon. Preston Henrichson  
Hon. Marissa Carranza Hernandez  
Law Office of Preston Henrichson, P.C.  
222 West Cano  
Edinburg, TX 78539  
Telephone: (956) 383-3535  
Telefax: (956) 383-3585

**Attorney for school district Defendants**

Hon. Ricardo R. Reyna  
Brock Person Guerra Reyna  
1506 Bexar Crossing  
San Antonio, TX 78232-1587  
Telephone: (210) 979-0100  
Telefax: (210) 979-7810

**Associate Counsel for Defendant Catherine Norquest**

Hon. Roger W. Hughes  
Adams & Graham  
222 E. Van Buren, West Tower  
P.O. Drawer 1429  
Harlingen, TX 78551  
Telephone: (956) 428-7495  
Telefax: (956) 428-2954

**Associate Counsel for Defendant Catherine Norquest**

Hon. Robert L. Galligan  
Jones, Galligan, Key, & Lozano, L.L.P.  
P.O. Drawer 8041  
Weslaco, TX 78599-9402  
Telephone: (956) 968-5402  
Telefax: (956) 969-9402